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JOSEPH PEPITONE,	:	6:21 Civ. 00781 (LEK) (ATB)
	:	
Plaintiff,	:	DECLARATION OF MICHAEL F.
	:	BUCHANAN IN SUPPORT OF
- against -	:	DEFENDANT NATIONAL
	:	BASEBALL HALL OF FAME AND
NATIONAL BASEBALL HALL OF FAME	:	MUSEUM, INC.’S MOTION TO
AND MUSEUM, INC.,	:	DISMISS THE COMPLAINT WITH
	:	PREJUDICE
Defendant.	:	
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1. I am an attorney duly admitted to practice before this Court and partner at the law firm of Patterson Belknap Webb & Tyler LLP, attorneys for Defendant National Baseball Hall of Fame and Museum, Inc. (the “Baseball Hall of Fame”). I am familiar with the facts of this action and respectfully submit this Declaration in support of the Baseball Hall of Fame’s Motion to Dismiss the Complaint.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the bankruptcy petition filed by Joseph Pepitone in *In re Pepitone*, Ch. 7 Case No. 8-10-72883-DTE (Bankr. E.D.N.Y. Apr. 22, 2010), ECF No. 1.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Statement Pursuant to Local Rule 2017 filed by Joseph Pepitone’s lawyer, Robert L. Pryor, in *In re Pepitone*, Ch. 7 Case No. 8-10-72883-DTE (Bankr. E.D.N.Y. Apr. 22, 2010), ECF No. 2.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Order discharging Joseph Pepitone from bankruptcy filed in *In re Pepitone*, Ch. 7 Case No. 8-10-72883-DTE (Bankr. E.D.N.Y. Aug. 12, 2010), ECF No. 20.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Order of Discharge and Notice to Creditors filed in *In re Pepitone*, Ch. 7 Case No. 8-10-72883-DTE (Bankr. E.D.N.Y. Aug. 14, 2010), ECF No. 21.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the bankruptcy docket in *In re Pepitone*, Ch. 7 Case No. 8-10-72883-DTE (Bankr. E.D.N.Y., filed Apr. 22, 2010).

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Final Decree closing Joseph Pepitone's bankruptcy proceeding filed in *In re Pepitone*, Ch. 7 Case No. 8-10-72883-DTE (Bankr. E.D.N.Y. July 18, 2011), ECF No. 22.

Dated: New York, New York
August 20, 2021

A handwritten signature in dark ink, appearing to read "Michael F. Buchanan", is written over a light blue horizontal line.

Michael F. Buchanan (Bar Roll #702975)

CERTIFICATE OF SERVICE

I, Michael F. Buchanan, hereby certify, pursuant to 28 U.S.C. § 1746, that on August 20, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

Dated: August 20, 2021
New York, New York

By: _____

A handwritten signature in black ink, appearing to read "Michael F. Buchanan", is written over a light gray rectangular background.

Michael F. Buchanan (Bar Roll #702975)